

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
URBAN CART INC., et ano,

Plaintiffs,

-against-

AUDREY BRETILLOT, et al,

Defendants.  
-----X

Civil Action File No.  
14-cv-07599 (JGK)(MHD)

AUDREY BRETILLOT,

Plaintiff,

-against-

CLIVE BURROW, et al,

Defendants.  
-----X

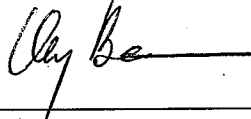
Civil Action File No.  
14-cv-7633 (JGK)(MHD)

**NOTICE OF MOTION TO  
DISMISS BRETILLOT'S  
SECOND AMENDED  
COMPLAINT**

**PLEASE TAKE NOTICE** that upon the annexed declaration Ray Beckerman dated April <sup>13</sup>, 2015, and the exhibits annexed thereto, and upon all prior papers and proceedings herein, the undersigned hereby moves before the Honorable John G. Koeltl, United States District Judge, in Courtroom 12B of the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, for an Order pursuant to Fed. R. Civ. P. 12(b)(6) dismissing the Second Amended Complaint of Audrey Bretillot in 14-cv-7633, for failure to state a claim, and for such other and further relief as to the Court seems proper.

Dated: Forest Hills, New York  
April 13, 2015

**RAY BECKERMAN, P.C.**

By:   
Ray Beckerman  
Attorneys for Clive Burrow  
and Urban Cart Inc.  
108-18 Queens Blvd. 4<sup>th</sup> Fl.  
Forest Hills, NY 11375  
(718) 544-3434  
[ray@beckermanlegal.com](mailto:ray@beckermanlegal.com)